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5 Attorney for Plaintiff
JEREMY WEICHELT

7 IN THE UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

9 JEREMY WEICHELT,

Case No.: 2:25-cv-02041-AC

10 Plaintiff,

11 v.
12 FRANK BISIGNANO,
Commissioner of Social Security,
13 Defendant.

**JOINT STIPULATION TO
TEMPORARILY STAY CASE DUE TO
LAPSE OF APPROPRIATIONS**

16 Plaintiff and the Commissioner of Social Security jointly move for a stipulated stay of
17 proceedings and an extension of existing deadlines commensurate with the duration of the lapse in
18 appropriations (government shutdown).

19 1. At midnight on September 30, 2025, the Federal Government's Continuing
20 Resolution maintaining the appropriations for the fiscal year that began on October 1, 2024 expired
21 without an appropriation of funds to the Department of Justice ("Department") or the Social Security
22 Administration ("SSA"). As a result, the Department's funding has expired and appropriations to
23 the Department have lapsed. The same is true for the SSA.

24 2. While, effective October 20, 2025, some attorneys for SSA may resume performing
25 work on Social Security cases arising under 42 U.S.C. § 405(g) during the current lapse in
26 appropriations as excepted work, SSA has a significant backlog of district court work, and there is
27 still uncertainty about defendant's ability to meet its most imminent deadlines.

28 3. The Commissioner of Social Security and Plaintiff therefore request a stay of

proceedings until Congress has restored appropriations to the Department and the SSA. The parties also request an extension of deadlines commensurate with the duration of the lapse in appropriations.

3. Plaintiff and the Commissioner of Social Security will file a notice after Congress has appropriated funds for the SSA or enacted another continuing resolution.

4. Once appropriations are restored and the stay lifted, the Commissioner of Social Security will confer with opposing counsel to determine what deadlines, if any, need to be extended as a result of the lapse in appropriations, and the parties will submit a stipulation, subject to the Court's review and approval, requesting new deadlines pursuant to the Court's scheduling order.

5. This stipulation is without prejudice to either party seeking a further order from the Court to lift any stay issued, as circumstances change.

Therefore, although the parties regret any disruption caused to the Court, the Commissioner of Social Security and Plaintiff hereby moves for a stipulated stay in this case until Congress has appropriated funds and Department of Justice attorneys are permitted to resume their usual civil litigation functions.

Dated: October 17, 2025

Respectfully submitted,

/s/ *Jared Walker*

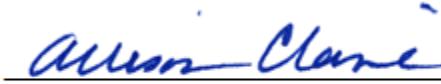
Jared Walker,
Attorney for Plaintiff

SO STIPULATED:

ERIC GRANT
United States Attorney

Dated: October 17, 2025

By: /s/ *Nicole Jabaily
(*authorized by email on 10/17/2025)
NICOLE JABAILY
Oscar Gonzalez de Llano
Special Assistant United States Attorney
Attorneys for Defendant

1 ORDER
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3 APPROVED AND SO ORDERED:
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5 Dated: October 20, 2025
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7 ALLISON CLAIRE
8 UNITED STATES MAGISTRATE JUDGE
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